

# Near You Networks

We Make The 'Net Work Without Wires

Before the  
Federal Communications Commission  
Washington, DC 20554

In the matter of )  
 )  
Modification of Parts 2 and 15 of the )  
Commission's Rules for unlicensed devices and ) ET Docket No. 03-201  
Equipment approval. )

**Comments of Near You Networks, Inc., a Wireless Internet Service  
Provider**

Near You Networks (NYN) hereby submits comment in response to the Commission's Notice of Proposed Rule Making on Modification of the Part 2 and 15 rules. NYN applauds the efforts of the commission's continued efforts to address the streamlining of technical rules with regard to antenna and radio combinations.

NYN applauds the Commission's suggestion on removal of the current limitations on exchanging similar antennae or other equipment for previously certified antennae and other equipment.

NYN believes that any professional installer should be more than qualified to match antenna and attached cable to a radio in such a way as to not violate FCC power limits already defined in the Part 2 and 15 rules.

Further, NYN believes that current power limits for point-to-multipoint communications in ISM or UNII bands should be increased, in order to provide for more coverage in dense areas. NYN primarily operates in New Jersey, an area with many trees, and while the 902-928 band works with some equipment in certain situations, we have found that point to point links in the 2.4 Ghz ISM band work just as well, since higher power limits can be used. Allowing our multipoint installations in the same areas to use more power would actually work to remove devices from the air, and lower the noise floor found in some rural to urban areas, and promote further spectrum use where not possible before.

Last, because of the many problems we face with Non-Line-Of-Sight (NLOS) issues, NYN believes that additional spectrum in a band lower than 900 Mhz may be necessary for ubiquitous wireless broadband deployment. Given spectrum in the 700 Mhz area with the appropriate "smart radios", NYN feels that coverage of much wider areas with little to no additional effort on its part would GREATLY improve marketability and general acceptance of wireless broadband.

Thank you for your time and efforts,

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